REMARKS/ARGUMENTS

The office action of December 2, 2008, has been reviewed and these remarks are responsive thereto. Claims 1-20, 22, 26-31, 37-42, 45 and 48-52 are pending in this application. By this amendment claims 1-20, 22, 26-31, and 42 have been amended. Reconsideration and allowance of the instant application are respectfully requested.

Rejections Under 35 U.S.C. § 112

Claims 1-20, 22 and 26-30 stand rejected under 35 U.S.C. § 112, first paragraph, as being indefinite. Applicants have amended the claims to present the claims in a more preferred form, and respectfully request the rejection be withdrawn.

Rejections Under 35 U.S.C. § 101

Claims 1-20, 22, 26-31, 37-42, 45 and 48-52 stand rejected under 35 U.S.C. § 101 as being directed to nonstatutory subject matter. Applicants have amended claims 1-20, 22, 26-31, and 42 to include a "computer system" as defined in at least Figure 7 and paragraph [0074] of the filed specification. Applicants respectfully request the rejection be withdrawn.

Rejections Under 35 U.S.C. § 102

Claims 1 and 31 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Pat. No. 6,345,288 to Reel et al. (Reed).

Claims 1 and 31 were amended in the previous response to the Office Action of March 12, 2008, filed on September 12, 2008, to include the features of previously presented dependent claims 21, 23-25, and 32-36. Previously presented dependent claims 21, 23-25, and 32-36 were not rejected as being anticipated by Reed in the Office Action dated March 12, 2008. Applicant believes this rejection was inadvertently included in the current Office Action. Accordingly, Applicant respectfully requests that this rejection be withdrawn, as Reed fails to teach or suggest all of the features of claims 1 and 31.

Claims 1-15, 18, 20-25, 27-36, 39, 41-47 and 49-52 stand rejected under U.S.C. § 102(e) as allegedly being anticipated by U.S. publication no. 2003/0074358 to Sarbaz et al. (Sarbaz).

Claim 1 recites, among other features, a knowledge manager comprising a plurality of metadata applications, the plurality of metadata applications comprising: a data model manager

for using the at least some of the metadata to manage at least one data model of the at least one information database; a data dictionary manager for using the at least some of the metadata to manage at least one data dictionary of the at least one information database; a knowledge entity manager for using the at least some of the metadata to manage at least one knowledge entity of the at least one information database; a data mapper for using the at least some of the metadata to manage at least one data mapping of the at least one information database; and a change manager for using the at least some of the metadata to manage at least one change associated with the at least one information database.

The Action alleges that Sarbaz discloses all of the features of claim 1. Specifically, the action points to knowledge layer 125 to show the claimed knowledge manager and the system 103 to show the claimed metadata database.

The Action further points to paragraph [0023] of Sarbaz to show the claimed data model manager. Sarbaz describes that the processing for the knowledge layer is performed by application server 205. Sarbaz, para. [0020]. However, in paragraph [0023], Sarbaz indicates that the tools 209 include a data model configurator that is used to add, delete and/or modify the semantics of the data for the common data model. Notably, as illustrated in Figure 3, the tools 209 is not part of the application server 205 or knowledge layer 125. Accordingly, Sarbaz fails to teach or suggest *a knowledge manager comprising a data model manager*, as recited in claim 1. There are three other independent reasons why Sarbaz does not anticipate claim 1.

First, the Action points to paragraph [0029] of Sarbaz to show the claimed data dictionary manager. Paragraph [0029] describes metadata tables, mapping modules, an importation analysis engine, and abstracted data tables. Notably, none of these are part of the application server 205 or knowledge layer 125. Accordingly, Sarbaz fails to teach or suggest *a knowledge manager comprising a data dictionary manager*, as recited in claim 1.

Second, the Action points to paragraphs [0020] and [0022] of Sarbaz to show the claimed knowledge entity manager. Notably, paragraphs [0020] and [0022] describe the knowledge layer 125 and application server 205. Sarbaz does not disclose a knowledge manager entity within the knowledge layer 125 or application server 205. Accordingly, Sarbaz fails to teach or suggest a *knowledge manager comprising a knowledge entity manager*, as recited in claim 1.

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Third, the Action refers to paragraphs [0026] and [0029] of Sarbaz to show the claimed data mapper. Claims [0026] and [0029] discuss map drivers 301 mapping data elements from different data sources and data models 303 and mapping modules 405. Notably, the map drivers 301 and mapping modules 405 are not part of the knowledge layer 125 or application server 205. Accordingly, Sarbaz fails to teach or suggest a *knowledge manager comprising a data mapper*, as recited in claim 1.

The Action refers to paragraphs [0026] and [0029] of Sarbaz to show the claimed change manager. At most, paragraphs [0026] and [0029] describe changes to the data being reflected in metadata tables. Notably, the metadata tables are not part of the knowledge layer 125 or application server 205. Accordingly, Sarbaz fails to teach or suggest a *knowledge manager comprising a change manager*, as recited in claim 1.

For at least the reasons discussed herein, claim 1 is allowable over Sarbaz.

Claims 31 and 42 include substantially similar features as claim 1, and are therefore allowable over Sarbaz for substantially the same reasons as claim 1.

Claims 2-15, 18, 20-25, 27-30, 32-36, 39, 41, 43-47 and 49-52 ultimately depend from claims 1, 31, or 42 and are allowable over Sarbaz for at least the same reasons as claims 1, 31, and 42.

Rejections Under 35 U.S.C. § 103

Claims 16-17, 26, 37-38 and 48 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Sarbaz et al. in view of U.S. patent no. 7,162,427 B1 to Myrick et al. (Myrick).

Claims 16-17, 26, 37-38, and 48 depend from claims 1, 31, or 42. As previously discussed, Sarbaz fails to teach or suggest all of the claimed features of claims 1, 31, and 42. Myrick fails to cure the deficiencies of Sarbaz with respect to claims 1, 31, and 42. Accordingly, claims 16-17, 26, 37-38, and 48 are allowable over the combination of Sarbaz in view of Myrick.

Claims 19 and 40 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Sarbaz in view of U.S. patent no. 6,564,263 B1 to Bergman et al.

Claims 19 and 40 depend from claims 1 or 31. As previously discussed, Sarbaz fails to teach or suggest all of the claimed features of claims 1 and 31. Bergman fails to cure the

deficiencies of Sarbaz with respect to claims 1 and 31. Accordingly, claims 19 and 40 are allowable over the combination of Sarbaz and Bergman.

Conclusion

Based on the foregoing, Applicant respectfully submits that the application is in condition for allowance and a notice to that effect is earnestly solicited. Should the Examiner believe that anything further is desirable in order to place the application in even better form for allowance, the Examiner is respectfully urged to contact Applicant's undersigned representative at the below-listed number.

Respectfully submitted,

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